

## Hamlet, Robert, EMNRD

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**From:** Hamlet, Robert, EMNRD  
**Sent:** Wednesday, October 2, 2019 3:49 PM  
**To:** Rebecca Pons  
**Cc:** Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD  
**Subject:** RE: [EXT] RE: Remediation Conditional Approval - Devon - Spud 16 St 8H - (2RP-5323) 10-2-2919

Rebecca,

I understand the location is surrounded by the salt lakes and potash mine. The table shows 4 out of the 7 soil sample locations were showing a Non-Detect or low chloride at only 1 ft excavation depth?

We will need 3 background samples preferably away from oil and gas equipment/activity in the very immediate area. The OCD will need the back-ground soil sample result pages included in the variance request from the 600 mg/kg limit for chlorides.

On the JP White #4 Spill, we are working our way through the queue and haven't got to that one as of yet.

Regards,

Robert J Hamlet  
State of New Mexico  
Energy, Minerals, and Natural Resources  
Oil Conservation Division  
811 S. First St., Artesia NM 88210  
(575) 748-1283  
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OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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**From:** Rebecca Pons <office2@sesi-nm.com>  
**Sent:** Wednesday, October 2, 2019 2:14 PM  
**To:** Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>  
**Subject:** [EXT] RE: Remediation Conditional Approval - Devon - Spud 16 St 8H - (2RP-5323) 10-2-2919

Robert,

I did see and document in the work plan the depth to water as you noted; however, this location is surrounded by the salt lakes at the potash mines and the chloride content in the soil is naturally occurring. In my work plan I documented the phone call that transpired between Bob Allen and Mike Bratcher regarding this phenomenon. Mike Bratcher concluded and agreed with Bob Allen that the contaminant of concern would be the TPH. Thereby, remediating the soil

to the extent that the petroleum hydrocarbons are below 100 ppm. I also confirmed this in the "Action Plan". Please advise me of your concurrence.

I think we would actually excavate to water before we would excavate the chlorides. All surrounding soil is "white" with salt from the chlorides as well.

On another note: have you had a chance to review the closure report for the JP White #4? That was the really large spill that you worked with us on during the remediation efforts, in order to grant us a waiver on the amount of confirmation samples that would be required. The API number for this site is 30-005-00411

This remediation was filed with an insurance company and they are refusing payment to our client until the closure report is approved. Could you kindly give me an update on this one?

Thank you!

Best Regards,

Rebecca Pons



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**From:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>

**Sent:** Wednesday, October 2, 2019 1:53 PM

**To:** Rebecca Pons <[office2@sesi-nm.com](mailto:office2@sesi-nm.com)>

**Cc:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Mann, Ryan <[rmann@slo.state.nm.us](mailto:rmann@slo.state.nm.us)>

**Subject:** Remediation Conditional Approval - Devon - Spud 16 St 8H - (2RP-5323) 10-2-2919

Rebecca,

We have received your Workplan/Remediation Proposal for **2RP-5323 Spud 16 St 8H**, thank you. This Workplan/Remediation proposal is approved with the following conditions.

The depth to groundwater is 31 feet. Please make sure the closure criteria for soils impacted by the release are below the limits of:

≤ 50 feet	Chloride***	EPA 300.0 or SM4500 Cl B	600 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg

Soil Sample area AH-4@1 ft. is over the limit for chlorides/TPH and needs to be excavated until it is under the limit for both. Additionally, the two soil samples areas in the berm AH-1@2 ft. and AH-2@1 ft. need to be excavated until they are under the limit of 600 mg/kg for chlorides.

Please let me know if you have any further questions.

Regards,

Robert J Hamlet  
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Oil Conservation Division  
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